

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORKIN RE BANK OF AMERICA CORP.  
SECURITIES, DERIVATIVE AND  
EMPLOYEE RETIREMENT INCOME  
SECURITY ACT (ERISA) LITIGATION

This document relates to:

Gegnas v. Bank of America Corp., et al.,  
No. 12 Civ. 6801; Mitnick, et al. v. Bank of  
America Corp., et al., No. 12 Civ. 6879;  
Shapiro v. Bank of America Corp., et al.,  
No. 12 Civ. 6864.

USDS-12NY

2012-07-12

MAGNIFICALLY FILED

DATE FILED: 12-7-12

Master File  
No. 09 MDL 2058 (PKC)Related File  
Nos. 12 Civ. 6801 (PKC),  
12 Civ. 6879 (PKC),  
12 Civ. 6864 (PKC)

ECF CASE

**STIPULATION AND PROPOSED ORDER**

WHEREAS, the above-captioned actions were filed on September 7 and September 11, 2012;

WHEREAS, defendants' deadline to answer plaintiffs' complaints or file a pre-motion conference letter with this Court detailing the basis for any anticipated motions to dismiss the complaints is January 8, 2013;

WHEREAS, plaintiffs' responses to any such pre-motion conference letter filed on January 8, 2013 are due on January 15, 2013;

WHEREAS, the parties agree good cause exists to extend the current deadlines;

NOW THEREFORE, the parties hereby STIPULATE and AGREE as follows:

1. Defendants shall answer or file a pre-motion conference letter detailing the basis for any anticipated motions to dismiss by April 9, 2013.
2. Plaintiffs shall respond to any pre-motion conference letter detailing the basis for any anticipated motions to dismiss by April 16, 2013.

Dated: New York, New York  
December 6, 2012

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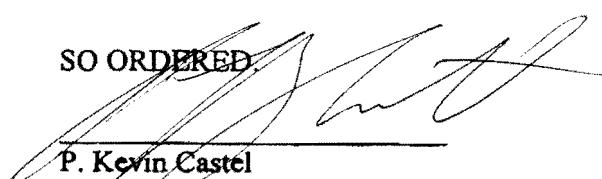
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Dated

12-7-12

SO ORDERED



P. Kevin Castel  
United States District Judge